

1. At its core, the action seeks redress for the plaintiffs’ alleged wrongful addition to the so-called Laurie List or Exculpatory Evidence Schedule (“EES”), a list of New Hampshire police officers whose personnel information contains potentially exculpatory evidence.
2. The disclosure of plaintiffs’ identity would undercut and render ineffective the eventual remedy sought.
3. Accordingly, before removal to this Court, the plaintiff filed in State Court, and the State

Court granted on September 28, 2021, a motion to seal “the docket and all pleadings in this matter” (the “Sealing Order”). Attached as Exhibit 1.

4. On November 15, 2021, the defendant sought removal of the matter to this Court pursuant to 42 U.S.C. §§ 1441 and 1446, with the Sealing Order still in effect.
5. Attached to the Notice of Removal is the Complaint filed in State Court – and while the caption and substantive allegations use a pseudonym, there is a reference path and filename (the “Filename”) at the end of the document which could reveal confidential information protected by the Sealing Order. See Document 1-2 filed 11/15/2021 (Exhibit to Defendant’s Notice of Removal), at 10.
6. Fed. R. Civ. P. 5.2(e) allows for the Court to enter a protective order which requires the redaction of additional information.
7. For the same reasons the State Court entered a Sealing Order, just cause exists for this Court to enter a protective order requiring the redaction of the Filename from Document 1-2.
8. The Filename is not a substantive allegation and is not necessary to the litigation of this matter.
9. Counsel for the defendants assent to the relief requested herein, however reserve the right to move the Court to unseal plaintiffs name in the future.

WHEREFORE, the Plaintiff respectfully requests that this Court:

- A. Direct the Clerk to redact the Filename from Document 1-2, starting with Y:\CLIENT FILES\19564...” and through “2021.09.02 Complaint-REDACTED.docx”);
- B. Take such other procedural action which causes the redaction of such Filename from the record of the Court; and

C. Grant such further relief as is just and equitable.

Respectfully submitted,

PLAINTIFF,
JOHN DOE,
By His Attorneys,

COOPER CARGILL CHANT, P.A.

/s/ Christopher T. Meier

Dated: November 19, 2021

Christopher T. Meier, Bar ID # 17136
2935 White Mountain Highway
North Conway, New Hampshire 03860
Tel: (603) 356-5439
Fax: (603) 356-7975
Email: cmeier@coopercargillchant.com

CERTIFICATE OF SERVICE

I, Christopher T. Meier, hereby certify that on the date shown, I delivered the foregoing document to all parties and counsel of record by e-file.

/s/ Christopher T. Meier

Dated: November 19, 2021

Christopher T. Meier, Bar ID # 17135